

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SEB INVESTMENT MANAGEMENT AB,  
Individually and on Behalf of All Others  
Similarly Situated,,

Plaintiff,

v.

ENDO INTERNATIONAL PLC; ENDO  
HEALTH SOLUTIONS INC.; PAUL V.  
CAMPANELLI; BLAINE T. DAVIS;  
MATTHEW W. DAVIS; RAJIV KANISHKA  
LIYANAARCHCHIE DE SILVA; IVAN  
GERGEL; SUSAN HALL; DAVID P.  
HOLVECK; ALAN G. LEVIN; JULIE H.  
MCHUGH; SUKETU P. UPADHYAY;  
DANIEL A. RUDIO; ROGER H. KIMMEL;  
SHANE M. COOKE; JOHN J. DELUCCA;  
ARTHUR J. HIGGINS; NANCY J. HUTSON;  
MICHAEL HYATT; WILLIAM P.  
MONTAGUE; JILL D. SMITH; and  
WILLIAM F. SPENGLER,

Defendants.

Civ. A. No. 2:17-CV-3711-TJS

**ORAL ARGUMENT REQUESTED**

**DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT**

Pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act of 1995, Defendants Endo International plc, Endo Health Solutions Inc., Paul V. Campanelli, Blaine T. Davis, Matthew W. Davis, Rajiv Kanishka Liyanaarchchie De Silva, Ivan Gergel, Susan Hall, David P. Holveck, Alan G. Levin, Julie H. McHugh, Suketu P. Upadhyay, Daniel A. Rudio, Roger H. Kimmel, Shane M. Cooke, John J. Delucca, Arthur J. Higgins, Nancy J. Hutson, Michael Hyatt, William P. Montague, Jill D. Smith, and William F. Spengler (collectively, "Defendants") hereby move the Court for the entry of an Order dismissing Plaintiff's Amended Complaint with prejudice. In support of this Motion, Defendants concurrently submit a Memorandum of Law, with attached exhibits, and a Proposed Order.

Defendants respectfully request oral argument in connection with this Motion.

Dated: April 2, 2018

Respectfully submitted,

**LATHAM & WATKINS LLP**

By: /s/ Jeff G. Hammel

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